

Alan G. Johnson
Johnson Electronics, LLC
380 W. 350 N.
Warsaw, IN 46582

Dear Mr. Johnson:

Re: Exempt Construction and Operation Status,
085-12961-00005

The application from Johnson Electronics, received on November 25, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following, to be located at 380 W. 350N, Warsaw, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) Spray Booth utilizing 1.12 gallons per day of contact adhesive cement applied with a conventional Binks spray gun.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (2) Pursuant to 326 IAC 6-3 (process operations), the PM emissions from the Glue Spray Booth shall not exceed the allowable particulate matter (PM) emissions rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$$E = (4.1) (P^{0.67}) \quad \text{Where } E = \text{rate of emissions in pounds per hour} \\ P = \text{process weight rate}$$

- (3) The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

(4) Volatile Organic Compounds (VOC) Limitations

The Permittee shall limit the actual VOC emissions to less than fifteen (15) pounds per day without add on controls or be subject to 326 IAC 8-2-1 (a)(4) (Surface Coating Limitations) and 326 IAC 8-2-9 (Miscellaneous Metal Coating).

(5) Compliance Requirements

(a) To comply with the actual VOC fifteen (15) pounds per day limit for exemption the Permittee shall keep at a minimum,

- (1) Daily usage of adhesive and solvent
- (2) Certification of actual VOC emission rates
- (3) Daily calculations of actual VOC emissions

(b) To demonstrate compliance with exemption

- (1) Records shall be submitted within thirty (30) days of a written request to the

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (2) All records shall be accessible on site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) years.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source, which may increase the potential VOC or NOx emissions to 10 tons per year, increase the PM10 potential emissions to 5 tons per year or increase the actual VOC emissions fifteen (15) pounds per day.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

cc: File - Kosciusko County
Kosciusko County Health Department
Air Compliance -Doyle Houser
Northern Regional Office
Permit Administration & Development - Janet Mobley
Compliance Data Section - Karen Nowak
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Johnson Electronics, LLC
Source Location:	380 W. 350 N., Warsaw, IN 46582
County:	Kosciuko
SIC Code:	3270
Exemption No.:	085-12961-00005
Permit Reviewer:	Gail McGarrity

The Office of Air Management (OAM) has reviewed an exemption application from Johnson Electronics, LLC relating to the following transportable video screen manufacturing emission unit.

- (a) One (1) Spray Booth utilizing 1.12 gallons per day of contact adhesive cement applied with a conventional Binks spray gun.

Enforcement Issues

There are no enforcement actions pending.

The staff recommends to the Commissioner that the exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 25, 2000, additional information was received on December 4, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. These calculations are provided in Appendix A of this document page 1.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted,

stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls.

Pollutant	Potential To Emit (tons/year)
PM	0.56
PM-10	0.56
SO ₂	0
VOC	8.50
CO	0
NO _x	0

Since the potential to emit PM and PM10 is less than 5 tons per year and the VOC potential to emit without controls is less than 10 tons per year this source is exempt, pursuant to IAC 326 2-1.1-3 (d) (1)(A) and (D).

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for PSD, 326 IAC 2-2.

Federal Rule Applicability

- a. There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- b. There are no National Emissions Standards for Hazardous Air Pollutants (NESHAPS) for this source.

State Rule Applicability

326 IAC 5-1-2 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2,

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute

averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3 (process operations), the PM emissions from the Glue Spray Booth shall not exceed the allowable particulate matter (PM) emissions rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$$E = (4.1) (P^{0.67}) \quad \text{Where } E = \text{rate of emissions in pounds per hour}$$

P = process weight rate

$$E = (4.1) (P)^{0.67}$$

E = lb/hr

$$\text{PM}_{10} \quad \text{lbs/hr} < \text{lb/hr}$$

No add on control equipment is needed to comply with this limit.

Volatile Organic Compounds (VOC) Limitations

The permittee shall limit the actual VOC emissions to less than 15 pounds per day without add on controls or be subject to 326 IAC 8-2-1 (a)(4) (Surface Coating Limitations) and 326 IAC 8-2-9 (Miscellaneous Metal Coating).

Compliance Requirement

- (a) To comply with the actual VOC 15 pounds per day limit for exemption the permittee shall keep at a minimum,
 - (1) Daily usage of adhesive and solvent
 - (2) Certification of actual VOC emission rates
 - (3) Daily calculations of actual VOC emissions
- (b) To demonstrate compliance with exemption
 - (1) Records shall be submitted within thirty (30) days of a written request to the

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- (2) All records shall be accessible on site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) years.

Conclusion

The operation of this transportable video screen manufacturing operation shall be subject to the conditions of the attached proposed exemption No. 085-12961-00005.